

**ORIGINAL**

49

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,

CRIMINAL NUMBER 05-80338  
  
HONORABLE ARTHUR J. TARNOW  
  
MAG. JUDGE MONA K. MAJZOUB

v.

**FILED**

JUL 19 2005

CLERK'S OFFICE, DETROIT-PSG  
U.S. DISTRICT COURT

- D-1 MONASSER MOSAD OMIAN,  
a.k.a. Nagi Mohamed Sharian,
- D-2 SADIK MONASSER OMIAN,  
a.k.a. Sadeq Munasser Omayan,
- D-3 NASSER G. M. WASSIL,  
a.k.a. Nasser Ghaleb Wassil,
- D-4 JARALLAH NASSER WASIL,  
a.k.a. Kaid Ahmed Almulaiki,  
a.k.a. Jarallah Ghaleb,
- D-5 SALEH ALLI NASSER,  
a.k.a. Ali Ghaleb,

- VIOLATIONS:
- 18 U.S.C. § 371: CONSPIRACY
  - 18 U.S.C. § 1001: FALSE STATEMENTS TO  
FEDERAL AGENTS
  - 18 U.S.C. § 1960: UNLICENSED MONEY  
TRANSMITTING  
BUSINESS
  - 18 U.S.C. § 1425: NATURALIZATION  
FRAUD
  - 18 U.S.C. § 1956: MONEY LAUNDERING
  - 21 U.S.C. § 841: POSSESSION WITH  
INTENT TO DISTRIBUTE
  - 31 U.S.C. § 5324: STRUCTURING
  - 31 U.S.C. § 5332: BULK CASH SMUGGLING
  - 18 U.S.C. § 2: AIDING AND ABETTING
- FORFEITURE ALLEGATIONS

Defendants.

**SECOND SUPERSEDING  
INDICTMENT**

THE GRAND JURY CHARGES:

**GENERAL ALLEGATIONS**

At all times pertinent to this indictment:

1. Federal law and regulations require any **money transmitting business** which affects interstate or foreign commerce **to register with the United States Department of Treasury**, in part to aid law enforcement authorities in detecting illegal money laundering activities, and to assist law enforcement in determining whether funds are being sent out of the United States to further illegal activities in other countries.
2. The term "**money transmitting**" includes **transferring funds on behalf of the public** by any and all means including, but not limited to, transfers within the United States or to other countries by wire, check, draft, facsimile, or courier.
3. The information provided to the Secretary of the Treasury when a money transmitting business is registered must include the following, at a minimum:
  - a. the **name and location** of the money transmitting business;
  - b. the **name and address of each person who owns, controls, directs** or otherwise participates in the conduct of the affairs of the business;
  - c. the **name and address of any financial institution** at which the business maintains a transaction account; and
  - d. an estimate of the **volume of business in the coming year** (which must be reported to the Secretary of the Treasury every year).
4. Title 31, United States Code, Section 5313 and the regulations implemented pursuant to that section require financial institutions that engage in a **currency transaction (that is, a deposit or a withdrawal) in excess of \$10,000** with a customer to report the transaction to the

Internal Revenue Service by filing a Currency Transaction Report (CTR).<sup>1</sup> CTRs are required to contain information regarding the **identity of the individual** depositing more than \$10,000 in cash into a financial institution, or obtaining more than \$10,000 in cash. These regulations also require that **multiple transactions be treated as a single transaction** if the financial institution has knowledge that they are by or on behalf of the same person, and they result in the financial institution either receiving or disbursing more than \$10,000 during any one business day.

5. CTRs are often used by law enforcement to uncover a wide variety of illegal activities, including narcotics trafficking and money laundering. The IRS makes use of information required to be reported on CTRs in connection with investigations of tax compliance and regulatory procedures. Individuals aware of the CTR reporting requirements who do not want the IRS or other law enforcement authorities to learn of their financial transactions sometimes take **active steps to cause financial institutions to fail to file CTRs**. These active steps are often referred to as **“structuring.”** Structuring cash deposits or withdrawals to avoid triggering the filing of a CTR by a financial institution is prohibited by 31 U.S.C. § 5324(a).

6. **Sana’a** is the capitol of the Republic of Yemen, and the primary business center of the country.

7. **MONASSER MOSAD OMIAN (D-1), SADIK MONASSER OMIAN (D-2), NASSER G. M. WASSIL (D-3), JARALLAH NASSER WASIL (D-4) and SALEH ALLI NASSER (D-5)** are all from the area around Juban, Yemen. All but **NASSER WASSIL** and **SALEH NASSER** are now naturalized United States citizens.

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<sup>1</sup>Prior to December 2003, CTRs were filed using Form 4879. The form was modified in December 2003 and re-named FinCEN Form 104.

**2744 / 2746 SALINA STREET, DEARBORN, MICHIGAN** is the address of a duplex owned and used by the conspirators for various purposes:

- a. **MONASSER OMIAN** and **SADIK OMIAN (D-2)** are the owners of record of the **2744 / 2746 Salina** property as of this date.
  - b. **MONASSER OMIAN** and his family lived at **2744 / 2746 Salina** until November 2004; they now live at **2781 Akron, Dearborn, Michigan**.
  - c. **SADIK OMIAN** currently uses the addresses **2744 Salina** and **2746 Salina** interchangeably, as his own address; in fact, **SADIK OMIAN** lives with **MONASSER OMIAN** at **2781 Akron, Dearborn, Michigan**.
  - d. Until early 2004, **JARALLAH WASIL** lived at **2746 Salina**; he continues to live in the metropolitan Detroit area with his wife.
  - e. **2746 Salina** is the return address used on packages being shipped to Yemen. It is also the address that some of the Hawala participants living in Yemen use to receive checks (such as Social Security Disability checks, United States Treasury income tax refund checks); their checks are mailed to the address, then deposited into the Hawala accounts at Comerica Bank, and the proceeds are distributed to the participants in Yemen.
9. **MONASSER MOSAD OMIAN (D-1)** entered the United States using the alias name "Nagi Mohamad Sharian." In 1978, he became a naturalized United States citizen. As "Nagi Mohamad Sharian," he married his wife, Nemah Ali Omian; his immigration papers falsely claim she was the "widow" of "Monasser Mosad Omian" at the time of their marriage. "Nagi Mohamad Sharian" then officially changed his name back to **MONASSER MOSAD OMIAN**.
10. **SADIK MONASSER OMIAN (D-2)**, also known as "Sadeq Munasser Omayan," is the son of Nemah Ali Omian, and the son of **MONASSER OMIAN (D-1)**.

**NASSER G. M. WASSIL** (D-3), also known as "Nasser Ghaleb Wassil," is a relative of **JARALLAH WASIL** (D-4). On December 8, 1997, **NASSER WASSIL** obtained a tourist visa allowing him to enter the United States. The visa listed his place of residence while in the United States as 2894 Richmond Terrace, Staten Island, New York; in 1997, that was the address of the Eden Deli, which was operated by Kassim and Abdullah Wassil. **NASSER WASSIL** left the United States in 1998 when his tourist visa expired, and he is currently living in Yemen.

12. **JARALLAH NASSER WASIL** (D-4) is also known as "Kaid Ahmed Almulaiki" and "Jarallah Ghaleb." Although he is related to **NASSER G. M. WASSIL** (D-3), when **JARALLAH NASSER WASIL** entered the United States he identified himself as "Kaid Ahmed Almulaiki"; his entry was sponsored by a Yemeni-born United States citizen named Ahmed Almulaiki. On September 22, 2000, when **JARALLAH WASIL** became a naturalized United States citizen, he officially changed his name from "Kaid Ahmed Almulaiki" to **JARALLAH NASSER WASIL**.

13. **SALEH ALLI NASSER** (D-5) is also known as "Ali Ghaleb." **SALEH NASSER** first came into the United States in 1994. On his visa application, **SALEH NASSER** listed his address in Yemen as Post Office Box 2033, Sana'a. Once in the United States, **SALEH NASSER** lived at 2894 Richmond Terrace, Staten Island, New York, the address of the Eden Deli, until he moved to Dearborn in 2001. **SALEH NASSER** works with **JARALLAH NASSER WASIL** (D-4) at the Gabasha Market, where he sells food and merchandise, as well as Khat and contraband cigarettes, to customers. **SALEH NASSER** also collects money from customers to be sent through the Hawala accounts, and deposits the money into the accounts at Comerica Bank.

None of the defendants **MONASSER MOSAD OMIAN (D-1)**, **SADIK MONASSER OMIAN (D-2)**, **NASSER G. M. WASSIL (D-3)**, **JARALLAH NASSER WASIL (D-4)** or **SALEH ALLI NASSER (D-5)** is now, or has ever been, registered with the Department of Treasury Financial Crimes Enforcement Network (FinCEN) as being licensed to operate a money transmitting business; neither are any of the alias names or businesses known to be associated with them.

15. The **Gabasha Market** is a convenience store located at 8033 McGraw in Detroit, Michigan; at times it has been known as the G&S Food Market. The registered owner of the Gabasha Market is Fahd Ban Gabasha. In February 2004, Fahd Ban Gabasha entered into an agreement with **JARALLAH NASSER WASIL (D-4)**, whereby **JARALLAH WASIL** took over the management and day-to-day sales at the store. Neither the Gabasha Market, nor G&S Food Market, nor Fahd Ban Gabasha, nor the address of 8031 / 8033 McGraw, Detroit, is now or has ever been registered with FinCEN as a money transmitting business, or associated with registered Western Union Agents.

16. All conduct in this indictment is alleged to have occurred within the Eastern District of Michigan, Southern Division, unless specifically stated otherwise.

17. All **dates** in this indictment are alleged to be "**on or about**" the specific date stated.

18. All **dollar amounts** in this indictment are approximate; they have been calculated based upon data available as of the date of the indictment.

**COUNT 1**  
(18 U.S.C. § 371 – CONSPIRACY  
TO COMMIT FEDERAL CRIMES)

- D-1 MONASSER MOSAD OMIAN, a.k.a. Nagi Mohamed Sharian
- D-2 SADIK MONASSER OMIAN, a.k.a. Sadeq Munasser Omayan
- D-3 NASSER G. M. WASSIL, a.k.a. Nasser Ghaleb Wassil
- D-4 JARALLAH NASSER WASIL, a.k.a. Kaid Ahmed Almulaiki, a.k.a. Jarallah Ghaleb
- D-5 SALEH ALLI NASSER, a.k.a. Ali Ghaleb

19. The General Allegations are incorporated into this count by reference.
20. Beginning in December 1999 and continuing to the present, the exact dates being unknown to the grand jury, in the Eastern District of Michigan, Southern Division, and elsewhere, defendants **MONASSER MOSAD OMIAN (D-1), SADIK MONASSER OMIAN (D-2), NASSER G. M. WASSIL (D-3), JARALLAH NASSER WASIL (D-4)** and **SALEH ALLI NASSER (D-5)**, together with individuals and businesses known and unknown to the grand jury, did willfully and unlawfully combine, conspire and agree together:
- a. to violate Title 18, United States Code, Section 1960 (1992), **Operating an Unlicensed Money Transmitting Business**, by knowingly conducting, managing, supervising or owning a money transmitting business affecting interstate or foreign commerce which was not in compliance with federal registration requirements;
  - b. to violate Title 18, United States Code, Section 1960 (2001), **Operating an Unlicensed Money Transmitting Business**, by knowingly conducting, managing, supervising or owning a money transmitting business affecting interstate or foreign commerce which was not in compliance with federal registration requirements, and which transported or transmitted funds that the defendants knew were derived from a criminal offense or were intended to be used to promote or support unlawful activity;

- c. to violate Title 18, United States Code, Section 1956, **Laundering Monetary Instruments**, by conducting and attempting to conduct financial transactions knowing the funds involved were proceeds derived from distribution of controlled substances and operation of an unlicensed money transmitting business, all specified unlawful activities within the meaning of Title 18, United States Code, Section 1956(c)(1), or property used to conduct or facilitate these activities; and intending to promote the activities, or to conceal or disguise the proceeds, or to avoid a state or federal transaction reporting requirement; and
- d. to violate Title 31, United States Code, Section 5324, **Structuring Transactions to Evade Reporting Requirements**, by causing or attempting to cause a domestic financial institution to fail to file a Currency Transaction Report (CTR) with the Internal Revenue Service as required by Title 31, United States Code, Section 5313(a) for currency transactions (that is, deposits or withdrawals) in excess of \$10,000 in a single day.



### OBJECTS OF THE CONSPIRACY

21. The defendants conspired and agreed to knowingly conduct, control, manage, supervise, direct and own an unlicensed money transmitting business, which they referred to as the **Hawala**, and to use it to send money from the Eastern District of Michigan to the Republic of Yemen and to an account at the Banque Indosuez in Lausanne, Switzerland in a manner affecting interstate and foreign commerce. The conspirators failed to comply with money transmitting registration requirements of the Department of Treasury, Title 31, United States Code, Section 5330, in violation of Title 18, United States Code, Section 1960 (as enacted in 1992, and as modified in 2001).
22. The conspirators collected **at least \$9,693,669.62** and deposited it into the Hawala accounts. The money came to the Hawala from mosques, businesses, and individuals in California, Colorado, New York, Ohio, Pennsylvania, Delaware, Washington State, Michigan and elsewhere. Many of the checks deposited into the Hawala accounts have instructions written on them, in English or in Arabic, directing the disbursement of the funds to specific individuals in Yemen; some of the checks specifically state they are "for the Hawala."
23. The conspirators knew or should have known that at least some of the money they moved through the Hawala accounts represented **proceeds of criminal activity**. For example:
  - a. The conspirators obtained **Cathinone ("Khat")**, a **Schedule I controlled substance**, imported from Kenya and elsewhere, which they re-packaged and sold routinely at the Gabasha Market. The conspirators commingled the money from the **sales of Khat** with money from the operation of the Hawala, and laundered it through the Hawala accounts.

b. The conspirators sold **contraband cigarettes**, that is, packs of cigarettes that did not bear the State of Michigan tax stamp as required by law, at the Gabasha Market. Some of the packs of cigarettes sold through the Market had State of Ohio tax stamps or fraudulently altered tax stamps. The conspirators commingled the money from the **sales of contraband cigarettes** with money from the operation of the Hawala, and laundered it through the Hawala accounts.

c. Ali Saleh Saad (who was indicted in Federal Criminal Case CR-02-40076 SBA, and convicted of drug trafficking and money laundering in federal court in San Francisco, California in 2004) has admitted that in 2001, he laundered at least **\$79,000 in drug proceeds** through **Comerica Bank account 0023-40561-6**, almost all of it in the form of money orders.

d. Money from other unlicensed Hawalas operating throughout the United States was regularly deposited into the Hawala accounts and transferred to Yemen. For example, on February 29, 2000, check 203 in the amount of \$1,000.00 drawn on the Key Bank account of Queen City Cigarettes and Candy in Buffalo, New York, signed by Mohamed Albanna and made payable to "Nagi Sharian," was endorsed by **MONASSER OMIAN (D-1)** and deposited into **Comerica Bank account 0023-40561-6**. In January, 2004, a grand jury sitting in the Western District of New York indicted Mohamed Albanna and three others in Criminal Case 02-CR-255S, and charged them, *inter alia*, with using the Queen City Cigarettes and Candy store to facilitate the operation of a Hawala sending millions of dollars from New York to Sana'a, Yemen and elsewhere.

24. The conspirators **structured the cash transactions** involving the Hawala in order to cause Comerica Bank and Charter One Bank to fail to file the cash transaction reports required

by law and regulation for cash deposits and withdrawals over \$10,000, by keeping the cash deposits into the accounts in the United States, and the withdrawals through banks in Yemen at \$10,000 or less, on all but a few occasions.

25. The defendants profited from their illegal activity, in part by charging a percentage of the money transferred (often 4%) as their commission on the illegal service they were providing.

### METHOD, MANNER AND MEANS

26. The conspirators used two primary procedures to receive and send money through the Hawala accounts, as outlined in the following examples. Although the conspirators' usual practice was to bundle many individual transactions together, the examples use a single transaction for the sake of clarity:

- a. A person from Yemen who is living in Detroit wants to send \$500 to family members who still live in Yemen. He gives \$520 in cash to a conspirator in Detroit, and tells him who should receive the money in Yemen. The conspirator deposits the money into the Hawala's local bank account in Detroit, keeps \$20 as his commission, and e-mails or faxes his co-conspirator located in Yemen, directing him to disburse \$500 to the intended recipient there. The co-conspirator in Yemen writes a check (usually made payable to himself or to cash) on the U.S. bank account, cashes the check at a bank in Yemen, and gives \$500 to the intended recipient in Yemen. There is no record of the transaction that would indicate income to the conspirators, or that the funds originated with the first individual, or whether the money was generated from legal or illegal activity, or who received the money in Yemen, or the intended use of the money once it is in Yemen, or even that the money was ever transmitted out of the United States.
- b. A conspirator in Detroit collects cash from various individuals who want to send money to Yemen. He takes out his commission and uses the remaining cash to buy money orders. He makes the money orders payable to the co-conspirator in Yemen or leaves the payee line blank, and ships the money orders from Detroit to Yemen by United Parcel Service or other common carrier. The conspirator tells the common carrier that the shipment contains "miscellaneous documents" rather than money orders. He sends

directions to his co-conspirator in Yemen, telling him how to disburse the money. The co-conspirator cashes the money orders in Yemen and gives the funds to the intended recipients there. Again, there is no record indicating income to the conspirators, or that the funds originated with the first individual, or whether the money was generated from legal or illegal activity, or who received the money, or the intended use of the money, or that it was transmitted out of the United States, and so on.

27. The conspirators opened the following bank accounts at Comerica Bank and Charter One Bank and used them, as well as an account at Banque Indosuez in Switzerland, to further the operation of the Hawala and to advance the goals of the conspiracy, as each conspirator could reasonably foresee.

a. **Comerica account 6815-37847-3**

i. Information relating to this account:

opened: 11/24/2000  
status: open

signatories: **MONASSER MOSAD OMIAN (D-1)**  
**SADIK MONASSER OMIAN (D-2); removed and replaced by**  
*Nemah Ali Omian*

deposits: **\$ 457,225.81**, including the following:

2001:	\$ 68,613.28
2002:	\$ 114,616.83
2003:	\$ 94,235.87
2004:	\$ 154,493.03
2/2005:	\$ 25,266.80

**SADIK OMIAN's** name was removed from the account, and Nemah Ali Omian's name was added, and the balance in the account was used to enable **MONASSER OMIAN** and Nemah Ali Omian to qualify for a mortgage on their house when they moved from 2744 / 2746 Salina Street, Dearborn, Michigan into 2781 Akron, Dearborn, Michigan in **November 2004**.

b. **Comerica account 0023-40561-6**

i. Information relating to this account:

opened: 12/1999  
status: closed 5/2002

signatories: **MONASSER OMIAN (D-1)**  
**SADIK OMIAN (D-2)**  
**NASSER WASSIL (D-3)**

deposits: **\$4,934,478.91**, including the following:

1999: \$ 175,833.66  
2000: \$2,220,854.89  
2001: \$1,746,375.12  
2002: \$ 752,015.24

ii. The conspirators wire transferred approximately **\$1,855,100** from Comerica Bank account 0023-40561-6 into Banque Indosuez account 0275-2404-8744 in Lausanne, Switzerland between December 1999 and December 2000.

iii. The following checks written on **Comerica Bank account 1851-37314-0**, all made payable to **MONASSER OMIAN (D-1)**, were deposited into **Comerica account 0023-40561-6**, as follows:

(1) 4/22/02: \$18,000  
(2) 4/26/02: \$14,000  
(3) 4/30/02: \$25,000  
(4) 5/07/02: \$20,000

c. **Charter One account 3652-00970-2**

i. Information relating to this account:

opened: 2/28/02  
status: open

signatories: **JARALLAH WASIL (D-4)**  
Nashiah Wasil *added in August 2004*

deposits: **\$ 133,442.21**

ii. After Comerica account 1851-37314-0 (below) was opened in April 2002, **JARALLAH WASIL** wrote checks on this account to move the money into the new account.

d. **Comerica account 1851-37314-0**

## i. Information relating to this account:

opened: 4/19/2002  
 status: closed 4/10/2003

signatories: **MONASSER OMIAN (D-1)**  
**NASSER WASSIL (D-3)**  
**JARALLAH WASIL (D-4)**

deposits: **\$2,061,116.92** in ten months, as follows:

(1)	April 2002:	\$63,849.57
(2)	May 2002:	\$194,325.94
(3)	June 2002:	\$209,952.78
(4)	July 2002:	\$223,880.49
(5)	August 2002:	\$344,440.81
(6)	September 2002:	\$389,260.77
(7)	October 2002:	\$207,611.79
(8)	November 2002:	\$236,040.10
(9)	December 2002:	\$175,704.00
(10)	January 2003:	\$16,050.67

ii. As described below, the money deposited into **Comerica Bank account 1851-37314-0** was disbursed in accordance with directions regularly e-mailed from **JARALLAH WASIL (D-4)** to an individual in Yemen identified as "Adulwahab Wasil."

iii. The following checks written on **Comerica Bank account 1851-37314-0**, all made payable to **MONASSER OMIAN (D-1)**, were deposited into **Comerica account 0023-40561-6**, as follows:

(1)	4/22/02:	\$18,000
(2)	4/26/02:	\$14,000
(3)	4/30/02:	\$25,000
(4)	5/07/02:	\$20,000

e. **Comerica account 1851-67516-3**

## i. Information relating to this account:

opened: 12/19/02  
 status: open

signatories: **NASSER WASSIL (D-3)**  
**JARALLAH WASIL (D-4)**

deposits: **\$2,594,992.40**, as follows:

12/2002:	\$	5,000.00
2003:	\$	619,222.62
2004:	\$	1,295,658.51
2/2005:	\$	675,111.27

ii. As described herein, while **JARALLAH WASIL (D-4)** was in Yemen, **SADIK OMIAN (D-2)** regularly sent e-mails to him from the United States, telling him how to distribute monies sent through the account in furtherance of the Hawala.

iii. Although he was not a signatory on this account, **MONASSER OMIAN (D-1)** exercised authority over this account by writing and negotiating numerous checks on the account.

f. **Comerica account 1851-37362-9**

## i. Information relating to this account:

opened: 5/2003  
 status: open

signatories: **MONASSER OMIAN (D-1)**

deposits: **\$35,707.57**, as follows:

9/2003 to 12/2003:	\$8,048.24
3/2004 to 5/2004:	\$27,659.33

## ii. Deposits include:

- (1) 7/29/03: \$9,000 cash deposit
- (2) 8/26/03: \$1,000 check from "Bottle's Liquor," Oakland, CA
- (3) 8/11/03: \$9,000 cash deposit
- (4) 4/9/04: \$9,300 in cash, \$2,061.35 in personal and payroll checks
- (5) 5/10/04: \$4,060 check payable to "**Sadig Omian**" from Grove Liquor, Berkeley, CA



g. **Comerica account 6813-45046-4**

opened: 11/24/97  
status: open

signatories: **MONASSER OMIAN (D-1)**  
Feisal A. Obeid  
2744 Salina Street, Dearborn, Michigan

deposits include:

- 1) \$17,000 in Food Stamp tickets and deposits
- 2) \$10,000 check from Shabaa Market, California deposited into the account on 11/2/01
- 3) four \$500 Western Union money orders payable to **MONASSER OMIAN (D-1)**, purchased at the Liberty Food Market, Lackawanna, New York, and deposited into the account on 1/8/01
- 4) six \$500 Travelers Express International money orders payable to **MONASSER OMIAN (D-1)**, purchased in New York, deposited into the account on 1/5/01

withdrawals include: \$9,000 check to Faisal Ali Obaid, cashed in Yemen on 12/30/02

h. **Banque Indosuez account 0275-2404-8744** in Lausanne, Switzerland

opened: unknown  
 status: unknown

signatories: Mohamed Abdulah A. Karim Al-Hadda

deposits: **\$1,855,100** wire transferred into the account from **Comerica account 0023-40561-6** in one year, from 12/13/99 through 12/22/00, as follows:

<b>Date</b>	<b>Amount, US \$:</b>	<b>Description #:</b>	<b>Reference #:</b>
12/13/1999	50,000.00	991213002636	9485001322
12/20/1999	50,000.00	991220002834	9485001543
12/28/1999	40,000.00	991228001607	9485001233
1/05/2000	40,000.00	000105002288	9485001284
1/18/2000	40,000.00	000118002939	9485001853
1/26/2000	30,000.00	000126001134	9485001318
2/01/2000	50,000.00	000201000851	9485001533
2/08/2000	50,000.00	000208000535	9485001200
2/16/2000	50,000.00	000216001704	9485001278
2/23/2000	30,000.00	000223001008	9485001288
2/29/2000	50,000.00	000229002554	9485001819
3/08/2000	70,000.00	000308000951	9485001343
3/14/2000	20,000.00	000314002134	9485001366
3/14/2000	20,100.00	000314001171	9485001367
3/23/2000	60,000.00	000323003206	9485001281
3/27/2000	50,000.00	000327000746	9485001395
3/31/2000	40,000.00	000331003402	9485001981
4/05/2000	30,000.00	000405003187	9485001368
4/11/2000	30,000.00	000411000984	9485001339
4/18/2000	60,000.00	000418001282	9485001418
4/27/2000	50,000.00	000427000654	9485001600
5/09/2000	10,000.00	000509000816	9485001295
5/15/2000	30,000.00	000515000929	9485001535
5/19/2000	20,000.00	000519000987	9485001352
5/23/2000	40,000.00	000523001468	9485001312
6/07/2000	40,000.00	000607001020	9485001352
6/20/2000	20,000.00	000620000875	948500138
1/22/2000	70,000.00	000622000949	9485001293
6/30/2000	50,000.00	000630004054	9485002252
7/10/2000	40,000.00	000710001856	9485001530
7/24/2000	70,000.00	000724001209	9485001344
7/31/2000	40,000.00	000731001485	9485001901
8/07/2000	40,000.00	000807001164	9485001292

<b>Date</b>	<b>Amount, US \$:</b>	<b>Description #:</b>	<b>Reference #:</b>
8/16/2000	65,000.00	000816002447	9485001348
8/24/2000	10,000.00	000824001310	9485001331
8/29/2000	20,000.00	000829001860	9485001482
9/06/2000	40,000.00	000906002330	9485001501
9/12/2000	30,000.00	000912000925	9485001327
9/20/2000	40,000.00	000920000706	9485001368
9/26/2000	20,000.00	000926002170	9485001379
10/11/2000	40,000.00	001011003157	9485001570
10/18/2000	30,000.00	001018002167	9485001428
10/31/2000	35,000.00	001031001789	9485001905
11/21/2000	10,000.00	001121003448	9485001516
11/27/2000	20,000.00	001127003225	9485001646
11/30/2000	40,000.00	001130003357	9485001985
12/13/2000	30,000.00	001213003029	9485001412
12/22/2000	45,000.00	001222003520	9485001742

#### **ROLES IN THE CONSPIRACY**

28. **MONASSER MOSAD OMIAN (D-1)**, also known as "Nagi Mohamed Sharian,"

furthered the objects of the conspiracy in many ways.

a. As detailed above, **MONASSER OMIAN** is a signatory on five accounts with Comerica Bank which have been regularly used both to conduct Hawala transactions totaling millions of dollars, and to deposit proceeds from the Hawala.

b. By operating the Hawala, **MONASSER OMIAN** is able to conceal his actual income, and able to continue collecting monthly disability checks for himself, his wife and his minor children, totaling \$2,258, from the Social Security Administration.

29. **SADIK MONASSER OMIAN (D-2)**, also known as "Sadeq Munasser Omayan,"

furthered the goals of the conspiracy in the following ways, among others:

a. **SADIK OMIAN** is a signatory on two of the Comerica Bank accounts known to have been used by the Hawala.

b. **SADIK OMIAN** obtained a Yahoo! e-mail account, sadik5000@yahoo.com, on April 24, 2001. **SADIK OMIAN** used that e-mail account to communicate regularly with **JARALLAH WASIL (D-4)** while **WASIL** was in Yemen. In his e-mails, **SADIK OMIAN** told **JARALLAH WASIL** how to disburse Hawala funds in **Comerica account 1851-67516-3** to the intended recipients of the money.

c. By operating the Hawala, **SADIK OMIAN** is able to conceal his actual income, and able to continue collecting monthly unemployment checks which he cashes through the Hawala accounts at Comerica Bank, and to obtain Food Stamps.

30. **NASSER G. M. WASSIL (D-3)**, also known as "Nasser Ghaleb Wassil," acted in furtherance of the objects of the conspiracy in many ways. **NASSER WASSIL** is a signatory on three Comerica Bank checking accounts that have been used to operate the Hawala, including Comerica account 0023-40561-6, which was opened in December 1999. Because he has been in Yemen since 1998, **NASSER WASSIL** has been the conspirator primarily responsible for disbursing the money in the Comerica accounts according to the directions relayed to him by his co-conspirators in the United States. Almost all of the checks used to withdraw money from the Comerica accounts are made payable to **NASSER G. M. WASSIL** or to his son, Abdulwahab Wasil, and endorsed by **NASSER WASSIL** as payee.

31. **JARALLAH NASSER WASIL (D-4)**, also known as "Kaid Ahmed Almulaiki" and "Jarallah Ghaleb," has acted on behalf of the conspiracy both here in the United States and in Yemen, including the following:

a. **JARALLAH WASIL** is the signatory on two Comerica checking accounts and a Charter One checking account that are used to conduct Hawala business.

- b. **JARALLAH WASIL** lived in Yemen at times prior to September 2003, and from November 2003 to February 2004. While he was in Yemen, **JARALLAH WASIL** communicated regularly with **SADIK OMIAN (D-2)** by e-mail. **SADIK OMIAN** told **JARALLAH WASIL** what monies had been deposited into the Hawala accounts, and **JARALLAH WASIL** would take the necessary steps to disburse the money in accordance with the instructions he received.
- c. As of the date of this indictment, **JARALLAH WASIL** manages the **Gabasha Market**, where he has worked almost daily since the spring of 2004.
- i. **JARALLAH WASIL** routinely accepts the money that individuals bring to him at the Gabasha Market to send to Yemen through the Hawala. **JARALLAH WASIL** conveys the money to be deposited into the Comerica accounts used by the Hawala.
- ii. Until February 2005, there was a sign prominently displayed on the front door of the Gabasha Market bearing the slogan, "Recibe Su Dinero Rapido!" ["Get Your Money Fast!"]. This is the advertising slogan of "Pronto Envios" ["Speedy Delivery"]. "Pronto Envios" is the name of a legal money transmitting business operating in New York. "Pronto Envios" is registered with FinCEN, and licensed to do business.
- iii. Neither the Gabasha Market, nor G&S Market, nor Fahd Gabasha, nor the address of 8031 / 8033 McGraw, Detroit, is a registered agent with "Pronto Envios."
- d. Most of the personal checks being deposited into the currently active Comerica accounts used by the Hawala are made payable to **JARALLAH WASIL**.

e. **JARALLAH WASIL** regularly writes checks made payable to himself to transfer money between the Hawala accounts, often bearing notations such as “shopping” or “rent.” The checks are for significant amounts of money, indicating that **JARALLAH WASIL** is authorized to exercise control over the accounts and take money for his own personal use, even though he is not the sole signatory on the accounts.

f. In addition to selling food and merchandise at the Gabasha Market, **JARALLAH WASIL** also sells quantities of **Khat** packaged in plastic bags for \$20.00 to \$30.00 a bag, and packages of **contraband cigarettes**, that is, cigarette packs that do not bear the State of Michigan tax stamp. **JARALLAH WASIL** commingles the money from those sales with money from the sale of food and merchandise and money collected from customers to be sent through the Hawala to Yemen, and deposits it all into the Hawala accounts.

g. Ledgers recording customers’ purchases (including **Khat** purchases) and debts are maintained at the Market on a daily basis.

32. **SALEH ALLI NASSER** (D-5), a.k.a. Ali Ghaleb, works at the **Gabasha Market**, where he regularly works selling merchandise and food, as well as quantities of **Khat** and **contraband cigarettes**, to customers. On occasion, **SALEH NASSER** deposits money from these various sources into the Hawala accounts at Comerica Bank. **SALEH NASSER** also has ready access to the ledgers recording customers’ purchases (including **Khat** purchases) and debts that are maintained at the Market.

#### OVERT ACTS

33. In furtherance of the conspiracy and to accomplish its objectives, one or more of the defendants **MONASSER MOSAD OMIAN** (D-1), **SADIK MONASSER OMIAN** (D-2),

**NASSER G. M. WASSIL (D-3), JARALLAH NASSER WASIL (D-4), SALEH ALLI NASSER (D-5)** and others known and unknown to the grand jury, performed and caused to be performed, in the Eastern District of Michigan and elsewhere, the following overt acts, among others.

34. During 2002, **JARALLAH WASIL (D-4)** regularly corresponded by e-mail with Abdulwahab N. G. Wasil in Yemen, discussing money that had been deposited into **Comerica Bank account 1851-37314-0** and instructing Abdulwahab N.G. Wasil on how to disburse the funds. For example:

a. Comerica Bank records for this account show the following 6 checks were cashed in Yemen at either the International Bank of Yemen or the Watani Bank:

<u>check #</u>	<u>date</u>	<u>payee</u>	<u>amount</u>	<u>posted</u>
2031	6/2/02	Abdulwahab N.G. Wasil	\$ 7,000	6/10/02
2032	6/2/02	Abdulwahab N.G. Wasil	\$ 5,000	6/12/02
2033	6/7/02	Abdulwahab N.G. Wasil	\$15,000	6/12/02
2034	6/8/02	Abdulwahab N.G. Wasil	\$ 5,000	6/12/02
2035	6/10/02	Abdulwahab N.G. Wasil	\$10,000	6/17/02
2036	6/12/02	Abdulwahab N.G. Wasil	\$ 8,000	6/17/02

On June 11, 2002, Abdulwahab Wasil sent **JARALLAH WASIL's** e-mail account, [Jarallahw@yahoo.com](mailto:Jarallahw@yahoo.com), a message in Arabic that translates:

**Subject:** *Statement has arrived for Sakiyah Balla'a.*

Brother Jarallah, I will collect and send the account of brother Mujalli. These are the numbers of the checks:

<u>Check Number</u>	<u>Amount</u>
2031	7000
2032	5000
2033	15000
2034	5000
2035	10000
2036	8000

For Sakiyah Balla'a will return the money to Wasil.

- b. Similarly, Comerica Bank records for this account show the following 9 checks were cashed in Yemen at either the International Bank of Yemen or the Watani Bank:

<u>check #</u>	<u>date</u>	<u>payee</u>	<u>amount</u>	<u>posted</u>
2001	5/4/02	Abdulwahab N.G. Wasil	\$6,908	5/8/02
2002	5/9/02	Abdulwahab N.G. Wasil	\$6,000	5/13/02
2003	5/9/02	Abdulwahab N.G. Wasil	\$6,000	5/13/02
2004	5/9/02	Abdulwahab N.G. Wasil	\$7,655	5/13/02
2055	5/10/02	Abdulwahab N.G. Wasil	\$6,185	5/18/02
2006	5/13/02	Abdulwahab N.G. Wasil	\$6,115	5/16/02
2007	5/13/02	Abdulwahab N.G. Wasil	\$6,115	5/16/02
2008	5/13/02	Abdulwahab N.G. Wasil	\$6,000	5/16/02
2009	5/13/02	Abdulwahab N.G. Wasil	\$6,905	5/16/02

On May 15, 2002, [jarallahw@yahoo.com](mailto:jarallahw@yahoo.com) received an e-mail containing the following chart; the "statement number" recorded in the chart also appeared in the corresponding memo line of the checks:

<b>Check Number</b>	<b>Amount</b>	<b>Statement Number</b>
2001	6908	1099
2001	6000	2000
2003	6000	2000
2004	7655	2000
2005	6185	2001
2006	6115	2002
2007	6115	2002
2008	6000	2003
2009	6905	2003



- c. Comerica Bank records for this account also show the following 14 checks were cashed in Yemen at either the International Bank of Yemen or the Watani Bank:

<u>check #</u>	<u>date</u>	<u>payee</u>	<u>amount</u>	<u>posted</u>
2016	5/15/02	Abdulwahab N.G. Wasil	\$ 5,000	5/22/02
2017	5/20/02	Abdulwahab N.G. Wasil	\$ 7,170	5/22/02
2019	5/22/02	Abdulwahab N.G. Wasil	\$11,745	5/28/02
2020	5/22/02	Abdulwahab N.G. Wasil	\$10,000	5/29/02
2021	5/25/02	Abdulwahab N.G. Wasil	\$10,000	5/29/02
2022	5/25/02	Abdulwahab N.G. Wasil	\$10,000	5/29/02
2023	5/28/02	Abdulwahab N.G. Wasil	\$10,000	5/30/02
2024	5/30/02	Abdulwahab N.G. Wasil	\$ 5,000	6/4/02
2025	5/30/02	Abdulwahab N.G. Wasil	\$10,000	6/3/02
2026	5/30/02	Abdulwahab N.G. Wasil	\$10,000	6/3/02
2027	5/30/02	Abdulwahab N.G. Wasil	\$ 9,000	6/6/02
2028	5/30/02	Abdulwahab N.G. Wasil	\$ 8,000	6/10/02
2029	6/2/02	Abdulwahab N.G. Wasil	\$ 5,000	6/10/02
2030	6/2/02	Abdulwahab N.G. Wasil	\$ 4,193	6/10/02

On May 31, 2002, [jarallahw@yahoo.com](mailto:jarallahw@yahoo.com) received the following e-mail and chart:

**Subject:** *Hi.*

Statement 2017 [unintelligible], apologies for the delay. Brother Jarallah, these are the checks, numbers along with the amounts.

Check number	Amount
2016	5000
2017	7170
2019	11745
2020	10000
2021	10000
2022	10000
2023	10000
2024	5000
2025	10000

2026	10000
2027	9000
2028	8000
2029	5000
2030	4193

35. On December 19, 2002, **NASSER WASSIL (D-3)** and **JARALLAH WASIL (D-4)** opened **Comerica Bank account 1851-67516-3** and used the account for the operation of the Hawala in furtherance of the conspiracy, as each conspirator could reasonably foresee. The conspirators are known to have moved over **\$2,358,074.79** through that account, which remains open as of the date of this indictment.
- a. Most of the checks withdrawing the money from **Comerica Bank account 1851-67516-3** in Yemen are made payable to **NASSER WASSIL (D-3)**, or to Abdulwahab N.G. Wasil. The checks are cashed in Yemen at either the International Bank of Yemen or the Watani Bank. Although several checks totaling well over \$10,000 are negotiated in a typical day, almost all of the individual checks are written for amounts of \$10,000 or less.
- b. During 2003, the money deposited into **Comerica Bank account 1851-67516-3** was disbursed in accordance with directions regularly e-mailed from **SADIK OMIAN (D-2)** in Michigan to **JARALLAH WASIL (D-4)** in Yemen. For example:
- i. On March 11, 2003, a Michigan Bureau of Workers' and Unemployment Compensation check for *\$646.48* payable to Aziz M. Abdulla, 2746 Salina, Dearborn was deposited into **Comerica Bank account 1851-67516-3**. On March

21, 2003, **SADIK OMIAN** (D-2) sent an e-mail in Arabic to **JARALLAH WASIL** (D-4) that translates:

. . . If Ibrahim Al Senbani comes or calls you, give him the exchange of three hundred dollars from Hanan Al Bakkal, okay. That and thank you, of course a check has arrived for Al Kafri, 646. We will see you soon. [Emphasis added.]

- ii. On April 16, 2003, a United States Treasury check for \$1,833.00 payable to Asia M. Abdulla and Sara M. Wasel, 2746 Salina, Dearborn was deposited into **Comerica Bank account 1851-67516-3**. On that same day, **SADIK OMIAN** (D-2) sent an e-mail in Arabic to **JARALLAH WASIL** (D-4) that translates:

Brother Jarallah, Al Qafari's taxes came, give it to him and it is \$1833. Take out the charge for the Hawala and give him in dollars or in [Yemeni] riyal, you and him know best. I did what I have to, and I deposited it in the bank. Thanks. [Emphasis added.]

- iii. The May 31, 2003 statement and deposit slips for **Comerica Bank account 1851-67516-3** indicates that of the total of \$30,036.70 deposited into the account that month, \$10,381.09 was deposited on May 5, 2003, and \$2,823.59 was deposited on May 30, 2003. On June 4, 2003, **SADIK OMIAN** (D-2) sent an e-mail in Arabic to **JARALLAH WASIL** (D-4) that translates:

. . . I also deposited a week ago 2,800, OK. And 10,000 from before, probably twenty days ago or more, OK. [Emphasis added.]

- iv. Photocopies of cancelled checks for **Comerica Bank account 1851-67516-3** indicate that *check 1043*, dated June 30, 2003, was made payable to **NASSER G. M. WASSIL** (D-3) for \$4,835.00 and posted on July 8, 2003. Similarly, *check 1044*, dated July 2, 2003, was made payable to **NASSER G. M. WASSIL** (D-3) for \$3,760.00 and posted on July 8, 2003. On July 10, 2003,

**SADIK OMIAN** (D-2) sent an e-mail in Arabic to **JARALLAH WASIL** (D-4)

that translates:

. . . Your letter has arrived and everything became clear. There is from Mohammed Hussein Al Hanini an exchange of \$2,460, and hand deliver to his son Mukhtar, OK, in Riyals, to Juban. Note as for the money that will be hand delivered to me, . . . I will take and then deposit in the account and then I will transfer it to your account, OK. You know it takes three days until it becomes OK. . . There are returned checks, 1040, 3000; 1043, 4835; 1044, 3760, OK. Allah willing we will see you and with thousand farewells. [Emphasis added.]

36. In furtherance of the conspiracy and to advance its objects, **MONASSER OMIAN** (D-1), **SADIK OMIAN** (D-2), **NASSER WASIL** (D-3), **JARALLAH WASIL** (D-4) and **SALEH NASSER** (D-5) carefully structured and assisted in structuring cash transactions by keeping cash deposits and withdrawals involving the Hawala accounts at or below \$10,000 on any given day.

a. The following overt acts of structuring, among others, were committed by the conspirators relating to **Comerica Bank account 0023-40561-6**:

- i. On 53 separate days, the conspirators made **53 cash deposits of more than \$9,000 and less than \$10,000** into the account from 2000 through 2002.
- ii. The conspirators, including **NASSER WASSIL** (D-3), also took great care in withdrawing the money from that account using checks written in amounts of \$10,000 or less, out of concern that checks written in amounts over \$10,000 would cause Comerica Bank to generate and maintain currency transaction records. The conspirators followed this pattern of withdrawals from this account on **86 separate days** between 2000 and 2002.

(1) For example, on November 12, 2001, the conspirators withdrew **\$50,292 by cashing 8 checks**, all written for less than \$10,000, all payable to Abdulawahab Wasil, all cashed in Yemen, and all posted to the Comerica account on the same day, November 16, 2001.

(2) Three days later, on November 15, 2001, the conspirators withdrew **\$31,190 by cashing 4 checks**, all written for less than \$10,000, all payable to Abdulwahab Wasil, all cashed in Yemen, and all posted to the Comerica account on the same day, November 19, 2001.

(3) Three days after that, the conspirators withdrew **\$34,920 by cashing 4 checks**, all written for less than \$10,000, all payable to Abdulwahab Wasil, all cashed in Yemen, and all posted to the Comerica account on November 26, 2001.

b. The following overt acts of structuring, among others, were committed by the conspirators relating to **Comerica Bank account 1851-37314-0**:

i. On 54 separate days between May 7, 2002 and December 24, 2002, the conspirators made **54 cash deposits of more than \$9,000 and less than \$10,000** into the account.

ii. The conspirators, including **NASSER WASSIL (D-3)**, also took great care in withdrawing the money from that account using checks written in amounts of \$10,000 or less, out of concern that checks written in amounts over \$10,000 would cause Comerica Bank to generate and maintain currency transaction records. The conspirators followed this pattern of withdrawals from this account on **42 separate days** in 2002.

(1) For example, on September 3, 2002, the conspirators withdrew **\$31,790 by cashing 4 checks**, all written for \$10,000 or less, all payable to Abdulawahab Wasil, all cashed in Yemen, and all posted to the Comerica account on the same day, September 11, 2002.

(2) Two days later, on September 5, 2002, the conspirators withdrew **\$22,000 by cashing 3 checks**, all written for less than \$10,000, all payable to Abdulwahab Wasil, all cashed in Yemen, and all posted to the Comerica account on the same day, September 11, 2002.

(3) Two days later, on September 7, 2002, the conspirators withdrew **\$19,000 by cashing 2 checks**, each written for \$9,500, each payable to Abdulwahab Wasil, each cashed in Yemen, and each posted to the Comerica account on the same day, September 23, 2002.

c. The following overt acts of structuring, among others, were committed by the conspirators relating to **Comerica Bank account 1851-67516-3**:

i. On 12 separate days between July 28, 2004 and November 15, 2004, the conspirators made **12 cash deposits of more than \$9,000 and less than \$10,000** into the account.

ii. The conspirators, including **NASSER WASSIL (D-3)**, also took great care in withdrawing the money from that account using checks written in amounts of \$10,000 or less, out of concern that checks written in amounts over \$10,000 would cause Comerica Bank to generate and maintain currency transaction records. The conspirators followed this pattern of withdrawals from this account on **50 separate days** in 2003 and 2004.

(1) For example, on October 17, 2004, the conspirators withdrew **\$28,703 by cashing 4 checks**, all written for \$10,000 or less, all payable to Abdulwahab Wasil, all cashed in Yemen, and all posted to the Comerica account on the same day, October 25, 2004.

(2) On October 30, 2004, the conspirators withdrew **\$26,091 by cashing 4 checks**, all written for \$10,000 or less, all payable to Abdulwahab Wasil, all cashed in Yemen, and all posted to the Comerica account on November 3 and 4, 2004.

(3) On November 10, 2004, the conspirators withdrew **\$24,451 by cashing 4 checks**, all written for \$10,000 or less, all payable to Abdulwahab Wasil, all cashed in Yemen, and all posted to the Comerica account on November 18, 2004.

d. The following overt acts of structuring, among others, were committed by the conspirators relating to **Charter One Bank account 3652-00970-2**. On May 24, 2004, the conspirators structured and aided and abetted others in structuring the **deposit of \$10,030** into the Charter One account by dividing it into three separate amounts and using three separate branches of Charter One Bank to make the deposits, as follows:

- i. \$4,000 deposit at Branch 179, 855 Graham Road, Stow, OH at 2:09 p.m.;
  - ii. \$5,000 deposit at Branch 726, 101 Slade Avenue, West Seneca, NY, at 2:55 p.m.;
- and
- iii. \$1,030 deposit at Branch 754, 1460 S. Park Avenue, Buffalo, NY at 3:31 p.m.

37. In furtherance of the conspiracy on February 9, 2005, **JARALLAH WASIL (D-4)** sent a package containing \$56,300 in money orders via United Parcel Service to **NASSER WASIL**

(D-3), Post Office **Box 2033, Sana'a**, Yemen. The return address on the package was **2746 Salina, Dearborn**, Michigan. The declared contents of the package was "miscellaneous documents," when in fact the package contained money orders purchased from various party stores, merchants and check cashing stores located in the State of New York. The money orders were purchased from Traveler's Express and from Western Union, and all were made payable to **NASSER G. WASSIL (D-3)**. The parcel was intercepted at the UPS facility in Louisville, Kentucky by agents of the Department of Homeland Security, Customs and Border Protection.

38. The conduct set forth in the **General Allegations** and in **Paragraphs 21 through 37** were overt acts within the scope of the conspiracy and were committed by the conspirators in furtherance of the conspiracy, as each conspirator could reasonably foresee. These offenses are alleged and incorporated into this count as overt acts.

39. The offenses charged in **Counts 2 through 8, and 10 through 12**, were within the scope of the conspiracy and were committed by the conspirators in furtherance of the conspiracy, as each conspirator could reasonably foresee. These offenses are alleged and incorporated into this count as overt acts.

40. All in violation of Title 18, United States Code, Section 371.



**COUNT 2**

(18 U.S.C. §§ 1960 and 2 (1992) – OPERATING AN ILLEGAL MONEY TRANSMITTING BUSINESS, AIDING AND ABETTING)

- D-1 MONASSER MOSAD OMIAN, a.k.a. Nagi Mohamed Sharian
- D-2 SADIK MONASSER OMIAN, a.k.a. Sadeq Munasser Omayan
- D-3 NASSER G. M. WASSIL
- D-4 JARALLAH NASSER WASIL, a.k.a. Kaid Ahmed Almulaiki, a.k.a. Jarallah Ghaleb

41. General Allegations and Paragraphs 21 through 37 are incorporated into this count by reference.

42. From December 1999 through December 30, 2001, the exact dates being unknown to the grand jury, in the Eastern District of Michigan, Southern Division, and elsewhere, defendants **MONASSER MOSAD OMIAN (D-1), SADIK MONASSER OMIAN (D-2), NASSER G. M. WASSIL (D-3)** and **JARALLAH NASSER WASIL (D-4)**, together with individuals and businesses known and unknown to the grand jury, did knowingly aid and abet each other in conducting, managing, supervising or owning an unlicensed money transmitting business which transferred millions of dollars from the Eastern District of Michigan to the Republic of Yemen and to Switzerland.

43. The unlicensed money transmitting business affected interstate or foreign commerce in some manner and degree.

44. The money transmitting business failed to comply with the registration requirements of the United States Department of Treasury as set out in Title 31, United States Code, Section 5330 (that is, it was not registered with the Secretary of the Treasury within 180 days of its establishment, as required by the Money Laundering Suppression Act of 1994, effective September 23, 1994).

45. All in violation of Title 18, United States Code, Sections 1960 and 2.

**COUNT 3**

(18 U.S.C. §§ 1960 and 2 (2001) – OPERATING AN ILLEGAL MONEY TRANSMITTING BUSINESS, AIDING AND ABETTING)

- D-1 MONASSER MOSAD OMIAN, a.k.a. Nagi Mohamed Sharian
- D-2 SADIK MONASSER OMIAN, a.k.a. Sadeq Munasser Omayan
- D-3 NASSER G. M. WASSIL, a.k.a. Nasser Ghaleb Wassil
- D-4 JARALLAH NASSER WASIL, a.k.a. Kaid Ahmed Almulaiki, a.k.a. Jarallah Ghaleb
- D-5 SALEH ALLI NASSER, a.k.a. Ali Ghaleb

46. General Allegations and Paragraphs 21 through 37 are incorporated into this count by reference.

47. Beginning in December 2001 and continuing to the present, the exact dates being unknown to the grand jury, in the Eastern District of Michigan, Southern Division, and elsewhere, defendants **MONASSER MOSAD OMIAN (D-1)**, **SADIK MONASSER OMIAN (D-2)**, **NASSER G. M. WASSIL (D-3)**, **JARALLAH NASSER WASIL (D-4)** and **SALEH ALLI NASSER (D-5)**, together with individuals and businesses known and unknown to the grand jury, did knowingly aid and abet each other in conducting, managing, supervising or owning an unlicensed money transmitting business which transferred millions of dollars from the Eastern District of Michigan to the Republic of Yemen.

48. The money transmitting business involved the transmission of funds that the defendants knew or should have known were derived from criminal offenses, or were intended to be used to promote or support unlawful activity. The unlicensed money transmitting business affected interstate or foreign commerce in some manner and degree.

49. The money transmitting business failed to comply with the registration requirements of the United States Department of Treasury as set forth in Title 31, United States Code, Section 5330 and 31 CFR 103.22.

50. All in violation of Title 18, United States Code, Sections 1960 and 2.

**COUNT 4**

**(31 U.S.C. § 5324; 18 U.S.C. § 2 – STRUCTURING  
FINANCIAL TRANSACTIONS TO EVADE  
REPORTING REQUIREMENTS, AIDING AND ABETTING)**

- D-1 MONASSER MOSAD OMIAN, a.k.a. Nagi Mohamed Sharian
- D-2 SADIK MONASSER OMIAN, a.k.a. Sadeq Munasser Omayan
- D-3 NASSER G. M. WASSIL, a.k.a. Nasser Ghaleb Wassil
- D-4 JARALLAH NASSER WASIL, a.k.a. Kaid Ahmed Almulaiki, a.k.a. Jarallah Ghaleb

51. General Allegations and Paragraphs 21 through 37 are incorporated into this count by reference.

52. Between December 1999 and May 2002, in the Eastern District of Michigan and elsewhere, **MONASSER MOSAD OMIAN (D-1), SADIK MONASSER OMIAN (D-2), NASSER G. M. WASSIL (D-3) and JARALLAH NASSER WASIL (D-4)** caused and attempted to cause, and aided and abetted each other and others known and unknown to the grand jury in causing and attempting to cause, a domestic financial institution to fail to file a Currency Transaction Report (CTR) with the Internal Revenue Service as required by Title 31, United States Code, Section 5313(a) for currency transactions (that is, deposits or withdrawals) in excess of \$10,000 in a single day, relating to **Comerica Bank account 0023-40561-6**.

53. On 53 separate days from 2000 through 2002, the defendants made, and aided and abetted each other and others known and unknown to the grand jury in making, **53 cash deposits of more than \$9,000 and less than \$10,000** into the account at Comerica branches in the Eastern District of Michigan.

54. The defendants acted knowingly and intentionally.

55. All in violation of Title 31, United States Code, Section 5324, and Title 18, United States Code, Section 2.

**COUNT 5**  
(31 U.S.C. § 5324; 18 U.S.C. § 2 – STRUCTURING  
FINANCIAL TRANSACTIONS TO EVADE  
REPORTING REQUIREMENTS, AIDING AND ABETTING)

- D-1 MONASSER MOSAD OMIAN, a.k.a. Nagi Mohamed Sharian
- D-2 SADIK MONASSER OMIAN, a.k.a. Sadeq Munasser Omayan
- D-3 NASSER G. M. WASSIL, a.k.a. Nasser Ghaleb Wassil
- D-4 JARALLAH NASSER WASIL, a.k.a. Kaid Ahmed Almulaiki, a.k.a. Jarallah Ghaleb

56. General Allegations and Paragraphs 21 through 37 are incorporated into this count by reference.

57. Between May 7, 2002 and December 24, 2002, in the Eastern District of Michigan and elsewhere, **MONASSER MOSAD OMIAN (D-1), SADIK MONASSER OMIAN (D-2), NASSER G. M. WASSIL (D-3) and JARALLAH NASSER WASIL (D-4)** caused and attempted to cause, and aided and abetted each other and others known and unknown to the grand jury in causing and attempting to cause, a domestic financial institution to fail to file a Currency Transaction Report (CTR) with the Internal Revenue Service as required by Title 31, United States Code, Section 5313(a) for currency transactions (that is, deposits or withdrawals) in excess of \$10,000 in a single day, Comerica Bank to fail to file reports required by law and regulation, relating to **Comerica Bank account 1851-37314-0**.

58. On 54 separate days between May 7, 2002 and December 24, 2002, the defendants made, and aided and abetted each other and others known and unknown to the grand jury in making, **54 cash deposits of more than \$9,000 and less than \$10,000** into the account at Comerica branches in the Eastern District of Michigan.

59. The defendants acted knowingly and intentionally.

60. All in violation of Title 31, United States Code, Section 5324, and Title 18, United States Code, Section 2.

**COUNT 6**  
(31 U.S.C. § 5324; 18 U.S.C. § 2 -- STRUCTURING  
FINANCIAL TRANSACTIONS TO EVADE  
REPORTING REQUIREMENTS, AIDING AND ABETTING)

D-1 MONASSER MOSAD OMIAN, a.k.a. Nagi Mohamed Sharian  
D-2 SADIK MONASSER OMIAN, a.k.a. Sadeq Munasser Omayan  
D-3 NASSER G. M. WASSIL, a.k.a. Nasser Ghaleb Wassil  
D-4 JARALLAH NASSER WASIL, a.k.a. Kaid Ahmed Almulaiki, a.k.a. Jarallah Ghaleb  
D-5 SALEH NASSER, a.k.a. Ali Ghaleb

61. General Allegations and Paragraphs 21 through 37 are incorporated into this count by reference.

62. Between December 2002 and March 23, 2005, in the Eastern District of Michigan and elsewhere, **MONASSER MOSAD OMIAN (D-1), SADIK MONASSER OMIAN (D-2), NASSER G. M. WASSIL (D-3), JARALLAH NASSER WASIL (D-4) and SALEH NASSER (D-5)** caused and attempted to cause, and aided and abetted each other and others known and unknown to the grand jury in causing and attempting to cause, a domestic financial institution to fail to a Currency Transaction Report (CTR) with the Internal Revenue Service as required by Title 31, United States Code, Section 5313(a) for currency transactions (that is, deposits or withdrawals) in excess of \$10,000 in a single day, relating to **Comerica Bank account 1851-67516-3**.

63. On 18 separate days between January 2003 and January 2005, the defendants made, and aided and abetted each other and others known and unknown to the grand jury in making, **18 cash deposits of more than \$9,000 and less than \$10,000** into the account at Comerica Bank branches in the Eastern District of Michigan.

64. The defendants acted knowingly and intentionally.

65. All in violation of Title 31, United States Code, Section 5324, and Title 18, United States Code, Section 2.

**COUNT 7**  
(31 U.S.C. § 5324; 18 U.S.C. § 2 – STRUCTURING  
FINANCIAL TRANSACTIONS TO EVADE  
REPORTING REQUIREMENTS, AIDING AND ABETTING)

- D-1 MONASSER MOSAD OMIAN, a.k.a. Nagi Mohamed Sharian
- D-2 SADIK MONASSER OMIAN, a.k.a. Sadeq Munasser Omayan
- D-3 NASSER G. M. WASSIL, a.k.a. Nasser Ghaleb Wassil
- D-4 JARALLAH NASSER WASIL, a.k.a. Kaid Ahmed Almulaiki, a.k.a. Jarallah Ghaleb
- D-5 SALEH ALLI NASSER, a.k.a. Ali Ghaleb

66. General Allegations and Paragraphs 21 through 37 are incorporated by reference.

67. On May 24, 2004, in the Eastern District of Michigan and elsewhere, **MONASSER MOSAD OMIAN (D-1), SADIK MONASSER OMIAN (D-2), NASSER G. M. WASSIL (D-3), JARALLAH NASSER WASIL (D-4) and SALEH ALLI NASSER (D-5)**, caused and attempted to cause, and aided and abetted each other and others known and unknown to the grand jury in causing and attempting to cause, a domestic financial institution to fail to file a Currency Transaction Report (CTR) with the Internal Revenue Service as required by Title 31, United States Code, Section 5313(a) for currency transactions (that is, deposits or withdrawals) in excess of \$10,000 in a single day, relating to **Charter One Bank account 3652-00970-2**.

68. On May 24, 2004, the defendants structured and aided and abetted others known and unknown in structuring the **deposit of \$10,030** into the Charter One account by dividing it into three separate amounts and using three separate branches of Charter One Bank to make the deposits, as follows:

- a. \$4,000 deposit at Branch 179, 855 Graham Road, Stow, OH at 2:09 p.m.;
- b. \$5,000 deposit at Branch 726, 101 Slade Avenue, West Seneca, NY, at 2:55 p.m.; and
- c. \$1,030 deposit at Branch 754, 1460 S. Park Avenue, Buffalo, NY at 3:31 p.m.

69. The defendants acted knowingly and intentionally.

70. All in violation of Title 31, United States Code, Section 5324, and Title 18, United States Code, Section 2.

**COUNT 8**

(31 U.S.C. § 5332; 18 U.S.C. § 2 – SMUGGLING AND ATTEMPTING TO SMUGGLE BULK CASH FROM THE UNITED STATES TO YEMEN; AIDING AND ABETTING)

D-3 NASSER G. M. WASSIL, a.k.a. Nasser Ghaleb Wassil

D-4 JARALLAH NASSER WASIL, a.k.a. Kaid Ahmed Almulaiki, a.k.a. Jarallah Ghaleb

71. The General Allegations and Paragraphs 21 through 37 are incorporated into this count by reference.

72. On February 8, 2005, in the Eastern District of Michigan, Southern Division and elsewhere, **JARALLAH WASIL (D-4)** attempted to send a package containing \$56,300 in money orders via United Parcel Service to **NASSER WASSIL (D-3)**, Post Office Box 2033, Sana'a, Yemen.

73. **JARALLAH WASIL** put the package into the stream of commerce at the Mail Boxes Etc. located on Greenfield Road in Dearborn, Michigan. **JARALLAH WASIL** provided a return address of **2746 Salina, Dearborn, Michigan**, as well as the telephone number for the Gabasha Market. **JARALLAH WASIL** declared the contents of the package to be "miscellaneous documents," when in fact the package contained Traveler's Express and Western Union money orders purchased from various party stores, merchants and check cashing stores located in the State of New York. All of the money orders were made payable to **NASSER G. WASSIL (D-3)**.

74. On February 9, 2005, the parcel was intercepted at the UPS facility in Louisville, Kentucky by agents of the Department of Homeland Security, Customs and Border Protection; it did not leave the United States.

5. The defendants acted with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, in violation of Title 31, United States Code, Section 5332, and Title 18, United States Code, Section 2.

**COUNT 9**  
(18 U.S.C. § 1425 – UNLAWFUL PROCUREMENT  
OF UNITED STATES CITIZENSHIP)

D-4 JARALLAH NASSER WASIL, a.k.a. Kaid Ahmed Almulaiki, a.k.a. Jarallah Ghaleb

76. General Allegations are incorporated into this count by reference.

77. On September 22, 2000, in the Eastern District of Michigan, Southern Division, **JARALLAH NASSER WASIL (D-4)**, acting contrary to law, procured, obtained, applied for and otherwise attempted to obtain, and did obtain, naturalization and United States citizenship for himself, knowing he was not lawfully entitled to that status.

78. In 1994, **JARALLAH WASIL** obtained a visa to enter the United States by falsely representing that he was “Kaid Ahmed Almulaiki,” the son of Ahmed Almulaiki, a Yemeni national and a naturalized United States citizen. Ahmed Almulaiki sponsored **WASIL**’s entry and assisted him in obtaining a visa, permanent resident status, and a “green card” by false and fraudulent pretenses and representations.

79. On February 18, 2000, in the Eastern District of Michigan, in connection with his application for United States citizenship, **JARALLAH WASIL** falsely stated he was “Kaid Ahmed Almulaiki” on Form N-400, Application for Naturalization.

80. On September 22, 2000, **JARALLAH WASIL** appeared at a naturalization proceeding as “Kaid Ahmed Almulaiki,” and was granted United States citizenship. He immediately “changed his name” to **JARALLAH NASSER WASIL**, his true identity.

81. All in violation of Title 18, United States Code, Section 1425.



**COUNT 10**

(21 U.S.C. § 841; 18 U.S.C. § 2 – POSSESSION WITH INTENT TO DISTRIBUTE  
AND DISTRIBUTION OF A CONTROLLED SUBSTANCE,  
AIDING AND ABETTING)

D-4 JARALLAH NASSER WASIL, a.k.a. Kaid Ahmed Almulaiki, a.k.a. Jarallah Ghaleb  
D-5 SALEH NASSER, a.k.a. Ali Ghaleb

82. General Allegations and Paragraphs 21 through 37 are incorporated into this count by reference.
83. Beginning in February 2004 and continuing through April 12, 2005, the exact dates being unknown to the grand jury, **JARALLAH WASIL (D-4)** and **SALEH NASSER (D-5)** knowingly, intentionally and unlawfully aided and abetted each other in possessing with the intent to distribute, and in distributing, a material, compound, mixture or preparation containing a quantity of Cathinone ("**Khat**"), a Schedule I controlled substance.
84. The defendants aided and abetted each other in importing Khat into the United States, re-packaging it, and distributing the Khat by selling it to customers through the Gabasha Market, in the Eastern District of Michigan, Southern Division.
85. All in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

**COUNT 11**  
(21 U.S.C. § 841– POSSESSION WITH INTENT  
TO DISTRIBUTE A CONTROLLED SUBSTANCE)

D-4 JARALLAH NASSER WASIL, a.k.a. Kaid Ahmed Almulaiki, a.k.a. Jarallah Ghaleb

86. General Allegations and Paragraphs 21 through 37 are incorporated into this count by reference.

87. On April 12, 2005, in the Eastern District of Michigan, Southern Division, **JARALLAH WASIL** (D-4) knowingly, intentionally and unlawfully possessed with the intent to distribute approximately 52 pounds of a material, compound, mixture or preparation containing a quantity of Cathinone (“Khat”), a Schedule I controlled substance.

88. All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT 12**  
(18 U.S.C. § 1001 – FALSE STATEMENTS  
TO FEDERAL AGENTS)

D-1 MONASSER MOSAD OMIAN, a.k.a. Nagi Mohamed Sharian

89. The General Allegations and Paragraphs 21 through 37 are incorporated into this count by reference.

90. On June 15, 2004, in the Eastern District of Michigan, Southern Division, defendant **MONASSER MOSAD OMIAN** (D-1) knowingly and willfully made materially false, fictitious and fraudulent statements and representations to officers of the Department of Homeland Security, Bureau of Immigration and Customs Enforcement (ICE) at Detroit Metropolitan Airport (DTW).

91. **MONASSER OMIAN** was approached at DTW and questioned by ICE agents as he returned from Yemen. **MONASSER OMIAN** told the agents he sends money to his family in

Yemen every three or four months, and the most money he has ever sent to Yemen at one time is \$1,000. **MONASSER OMIAN** denied having any bank accounts in Yemen. In fact, **MONASSER OMIAN** has sent millions of dollars to Yemen and to Switzerland since 1998, sometimes over \$300,000 in one month.

92. The federal agents were then investigating the violations of federal criminal law charged in this matter, and **MONASSER OMIAN** intended to affirmatively mislead their investigation.

93. All in violation of Title 18, United States Code, Section 1001(a)(2).

**COUNT 13**  
(18 U.S.C. § 1001 – FALSE STATEMENTS  
TO FEDERAL AGENTS)

D-1 **MONASSER MOSAD OMIAN**, a.k.a. Nagi Mohamed Sharian

94. The General Allegations and Paragraphs 21 through 37 are incorporated into this count by reference.

95. On April 28, 2004, in the Eastern District of Michigan, Southern Division, defendant **MONASSER MOSAD OMIAN** (D-1) knowingly and willfully made materially false, fictitious and fraudulent statements and representations to the Social Security Administration in order to continue to obtain Social Security Disability Income (SSI), and made or used false writings or documents containing materially false, fictitious and fraudulent statements or entries.

96. **MONASSER OMIAN** initially obtained SSI on May 1, 2001, and he, his wife and his minor children have all received checks totaling \$2,258 from SSI, every month, since that date.

97. On April 28, 2004, **MONASSER OMIAN** came into the Social Security Administration Office 361 in Dearborn, Michigan to be interviewed and to fill out Form SSA-454-BK, Report of Continuing Disability Interview. Page 5, paragraph 11 of the form asked: "Since you became

disabled, have you done any work?" **MONASSER OMIAN** wrote that he had worked only one day during January 2002, as an automobile inspector earning \$23.00 an hour.

98. On page 7 of the form, **MONASSER OMIAN** again wrote that since he began receiving SSI, he worked only one day in January 2002, and he did not work at all in 2003. When the interviewer advised him that the Summary Earnings Query (SEQY) reflected income he had earned in 2002 and 2003 that he had not indicated on the form, **MONASSER OMIAN** told the interviewer that someone else must be using his social security number, or that the SEQY must include worker's compensation he had received in 2002. At no time did **MONASSER OMIAN** reveal that he had received income from running his unlicensed money remitting business.

99. Page 8 of the form is headed "Authorization and Notification Statements." It states:

I understand that this report will be used to determine whether to continue or to stop my disability benefits and Supplemental Security income payments. I also understand that if I am receiving Social Security disability benefits and Supplemental Security income payments, this questionnaire is applicable to both claims.

\* \* \* \*

— I agree to notify the Social Security Administration if my medical condition improves or if I go to work.

— I know that anyone who makes a false statement or representation of a material fact in an application or for use in determining a right to payment under the Social Security Act commits a crime punishable under Federal Law. I affirm that the above statements are true.

100. **MONASSER OMIAN** signed and dated the form under that notification statement, well-knowing that he had significant income from owning, managing and conducting the business of the Hawala during 2002 and 2003, and that he did not disclose that income to the Social Security Administration.

101. **MONASSER OMIAN** knowingly made false statements and misrepresentations, intending to affirmatively mislead the interviewer and the Social Security Administration. The

Social Security Administration relied on **MONASSER OMIAN**'s false statements and misrepresentations, and authorized him to continue receiving monthly Social Security Disability Insurance checks for himself, his wife and his five minor children, totaling \$2,258.

102. All in violation of Title 18, United States Code, Section 1001(a)(2).

**COUNT 14**  
(18 U.S.C. § 1001 – FALSE STATEMENTS  
TO OBTAIN FEDERAL BENEFITS)

D-2 **SADIK MONASSER OMIAN**, a.k.a. Sadeq Munasser Omayan

103. General Allegations and Paragraphs 21 through 37 are incorporated into this count.

104. From March 2004 through November 2004, in the Eastern District of Michigan, Southern Division, **SADIK MONASSER OMIAN** (D-2), also known as Sadeq Munasser Omayan, knowingly and willfully made materially false, fictitious and fraudulent statements and representations to the Family Independence Agency in order to qualify for Federal Food Assistance Benefits (food stamps), and made and used writings or documents containing materially false, fictitious and fraudulent statements or entries in support of those statements.

105. Included in the false statements are the following:

a. On an application for assistance dated March 4, 2004, **SADIK OMIAN** affirmatively stated he had no checking account, and that he had not had a checking account during the past 36 months. In fact, **SADIK OMIAN** was a signatory on **Comerica account 6815-37847-3** at that time. **SADIK OMIAN** had also been a signatory on **Comerica account 0023-40561-6** through May 2002, less than 36 months earlier. Well over **\$5,000,000** was transferred through those two accounts while **SADIK OMIAN** was authorized to access them.

b. On the same application dated March 4, 2004, **SADIK OMIAN** affirmatively stated he had no safe deposit box, and that he had not had a safe deposit box during the past 36 months. In fact, **SADIK OMIAN** had and was authorized to access **Comerica Bank Safe Deposit Box 1086**, located within Comerica Bank Branch 172 in Detroit, Michigan.

c. **SADIK OMIAN** made those same false representations on applications dated August 2004 and November 2004.

106. **SADIK OMIAN** signed the applications after certifying, under penalty of perjury, that all the information he provided was true, and acknowledging he could be prosecuted for perjury or false statements if he intentionally provided false information.

107. All in violation of Title 18, United States Code, Section 1001.

#### **FORFEITURE ALLEGATIONS**

108. As a result of the violations of Title 18, United States Code, Sections 371, 1956 and 1960; Title 21, United States Code, Section 841; and Title 31, United States Code, Section 5324 and 5332 as set forth in Counts 1-8, 10 and 11, defendants **MONASSER OMIAN (D-1)**, **SADIK OMIAN (D-2)**, **NASSER WASSIL (D-3)**, **JARALLAH WASIL (D-4)** and **SALEH NASSER (D-5)**, shall forfeit to the United States any property, real or personal involved in a transaction or attempted transaction in those violations, or any property traceable to such property, and any property that is proceeds of those violations, pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. §2461, 18 U.S.C. §§ 982 (a)(1) and (C), 21 U.S.C. §853, 31 U.S.C. §§ 5317 and 5332(b)(2).

109. Such property includes, but is not limited to, **\$9,693,669.62** in United States currency and all traceable interest and proceeds for which the defendants are jointly and severally liable. Such sum in aggregate is property representing the proceeds of the aforementioned offenses, or money that was involved in the aforementioned offenses, or is traceable to such property, in violation of 18 U.S.C. §§ 371, 1956, 1960, 21 U.S.C. § 841, and 31 U.S.C. §§ 5324 and 5332.

110. Also included are the following bank accounts, currency and real properties, which are involved in the violations charged in this Indictment:

- a. **\$24,352.26** in U.S. Currency seized from **Comerica Bank** account **6815-37847-3**;
- b. **\$51,590.64** in U.S. Currency seized from **Comerica Bank** account **1851-67516-3**;
- c. **\$2,508.18** in U.S. Currency seized from **Comerica Bank** account **6813-45046-4**;
- d. **\$2,512.06** in U.S. Currency seized from **Charter One** account **3652-00970-2**;
- e. **Banque Indosuez** account **0275-2404-8744**;
- f. **\$48,753.00** in U.S. Currency seized on April 12, 2005, pursuant to a federally authorized search warrant;
- g. the real property commonly known as **2744 / 2746 Salina Street, Dearborn, Michigan**, and further described as Lot 344, Salina Park Subdivision according to the plat thereof, as recorded in Liber 20, page(s) 7, of Plats Wayne County Records;
- h. the real property commonly known as **2781 Akron, Dearborn, Michigan**, and further described as Lots 131 & 132, Fairfield Subdivision.

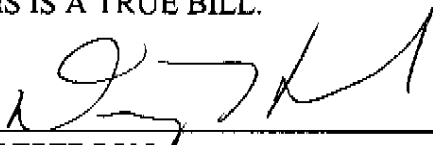
111. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), if the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third party;
- iii. has been placed beyond the jurisdiction of the Court;

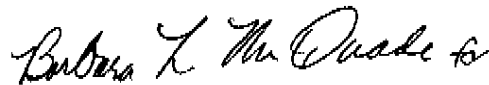
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek to forfeit any other property of the defendants up to the listed value.

THIS IS A TRUE BILL.

  
\_\_\_\_\_  
FOREPERSON

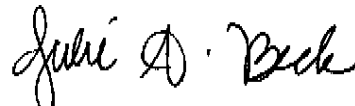
STEPHEN J. MURPHY  
United States Attorney



ERIC STRAUS  
Assistant United States Attorney



CYNTHIA OBERG  
Assistant United States Attorney



JULIE A. BECK  
Assistant United States Attorney

Dated: July 19, 2005



**ORIGINAL**



States District Court in District of Michigan	<b>Criminal Case Cover Sheet</b>	Case Number 05-80338 <b>ARTHUR J. TARNOW</b>
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**MAGISTRATE JUDGE MONA K. MAJZOUB**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>ST</i>

**Case Title:** USA v. MONASSER OMIAN (D-1), SADIK OMIAN (D-2), NASSER WASSIL (D-3) and JARALLAH WASSIL (D-4)

**County where offense occurred :** WAYNE

**Check One:**       **Felony**                       **Misdemeanor**                       **PLEA**

- Indictment \_\_\_ / Information \_\_\_ no prior complaint.
- Indictment \_\_\_ / Information \_\_\_ based upon prior complaints [Case number]
- Indictment \_\_\_ / Information \_\_\_ based upon LCrR 57.10 (d) [Complete Superseding section below]

JUL 19 2005

CLERK'S OFFICE, DETROIT-PSG  
U.S. DISTRICT COURT

**Superseding Case Information:**

**Superseding to Case No:** 05-80338                      **Judge:** Hon. Arthur J. Tarnow

- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>
SALEH ALLI NASSER (D-5)	18 U.S.C. §§ 1425, 1956, 1960 (1992) 21 U.S.C. § 841(a)(1)

July 19, 2005  
Date

\_\_\_\_\_  
CYNTHIA OBERG (P 36338)  
Assistant United States Attorney

(313) 226-9701  
Phone Number

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.